Montana Fish, Wildlife & Parks

Wildlife Bureau
PO Box 200701
Helena MT 59620-0701
November 13, 2012

Dear Interested Person:

Montana Fish, Wildlife & Parks is requesting public comment on proposed 2012 - 2013 Helena Urban Deer Take and the proposed recommendations from the Elk Management Guidelines in Areas with Brucellosis Working Group. Additional information is below. Note different public comment deadlines.

2012 - 2013 Helena Urban Deer Take – Proposed

The proposal is for up to 200 deer to be taken by the City of Helena between December 21, 2012 and December 31, 2013. Deer may not be taken between April 1, 2013 and November 15, 2013.

Deer survey data collected during October revealed an estimate of approximately 34 deer / square mile within the City of Helena. This is comparable to the 32 deer / square mile estimated in 2011, and above the City's identified density objective of 25. Meat from harvested deer will continue to be made available to community food bank efforts.

Elk Management Guidelines in Areas with Brucellosis Working Group – Proposed

The working group's issue statement, objectives and recommended types of action items are listed below (see Appendix 1). This includes the concept of local working groups (these local groups being different from this first "statewide" working group). Fundamental objectives in bold are those intended to be addressed by stated action items. Overall effectiveness at achieving fundamental objectives would be routinely assessed. The action items listed represent identified examples generally having the intent to adjust elk distribution in pursuit of reduced brucellosis transmission risk between elk and livestock. The working group's recommendations, if adopted by the Commission, would represent a framework for local diverse working groups that could assist FWP in identifying specific actions fitting local circumstances. Many specific actions these groups might identify within this framework would require additional Commission approval before implementation (Appendix 2). A briefing paper on the working group's composition and process is also included here (Appendix 3). A map of the Designated Surveillance Area (DSA) established by the Montana Department of Livestock for brucellosis is also attached. This area identifies that area in Montana where brucellosis has been identified.

COMMENT PERIOD DEADLINES AND FINAL ADOPTION MEETINGS

The deadline for public comment on the proposed 2012 – 2013 Helena Urban Deer Take is 5:00 PM Monday, December 17, 2012. Final adoption on these items will be made at the December 20, 2012 FWP Commission meeting.

The deadline for public comment on the proposed Elk Management Guidelines in Areas with Brucellosis Working Group is 5:00 PM Thursday, December 20, 2012. Final adoption on these items will be made not sooner than the January 2013 FWP Commission meeting.

TO MAKE COMMENT

For further clarification, you may call the Wildlife Bureau office at 406-444-2612. To submit comments electronically, this letter with the imbedded links below can be found under "Opportunity for Public Comment" on the Hunting home page at the fwp.mt.gov website. Written comments can be sent to: FWP – Wildlife Bureau, Attn: Public Comment, POB 200701, Helena MT 59620-0701. **Please note different comment deadlines**.

Imbedded Links to Submit Public Comment

2012 – 2013 Helena Urban Deer Take 2012– Proposed
(The deadline for public comment on this item is 5:00 PM Monday, December 17, 2012.)

http://fwp.mt.gov/hunting/publicComments/2012helenaUrbanDeer.html

Elk Management Guidelines in Areas with Brucellosis Working Group – Proposed *(The deadline for public comment on this item is 5:00 PM Thursday, December 20, 2012.)*

http://fwp.mt.gov/hunting/publicComments/2012elkMgmtGuidelinesBrucellosisWG.html

Appendix 1

ELK MANAGEMENT GUIDELINES IN AREAS WITH BRUCELLOSIS WORKING GROUP PROPOSED RECOMMENDATIONS

Issue Statement:

Brucellosis is a contagious bacterial disease that affects livestock, elk and bison in the GYA. It is a federally and internationally regulated disease. In recent years, brucellosis has been found in livestock herds in southcentral and southwest Montana, and evidence indicates elk are the likely source.

Brucellosis itself, as well as the requirements of brucellosis disease regulations, threaten the viability of the livestock industry in this area and landowner tolerance of elk because of the increased direct and indirect costs associated with repeated testing, possible quarantine, and changes in land use resulting from disease regulation. In addition, while a large portion of Montana's economy derives from major exports of livestock, brucellosis results in limitations on marketing options (stigma associated with cattle produced on the DSA), as well as the ability to transport/export into and out of the DSA and the state of Montana. This is especially true because the prevalence of brucellosis in the elk population seems to be increasing.

Management tools developed by the FWP Commission will be subject to considerable uncertainty due to 1) the multiple agencies, jurisdictions, and various interest groups involved in management of brucellosis, 2) incomplete understanding of the distribution of Brucella in elk populations, and 3) incomplete understanding of how elk movements, behavior, and seroprevalence contribute to possible transmission of brucellosis.

Maintaining the viability of the livestock industry as well as livestock owners' tolerance of elk populations in this area is important; elk populations benefit from a viable livestock industry because significant elk habitat and hunter harvest opportunity occur on private lands. Tools for reducing the prevalence of brucellosis in elk could not only reduce the risk of transmissions to cattle, but could also help restore traditional movements and distributions of elk. Eradication of brucellosis in elk is not currently feasible; management tools need to be endorsed by the FWP Commission that will reduce and if possible eventually eliminate the risk of transmission between elk and livestock, in a manner that considers the interests of livestock owners, landowners, wildlife enthusiasts, recreationalists and hunting groups.

Objectives **(fundamental objectives in bold):**

STRATEGIC OBJECTIVE: Maintain state wide brucellosis-free status for Montana.
STRATEGIC OBJECTIVE: Contain, reduce, and eventually eliminate the DSA.
STRATEGIC OBJECTIVE: Minimize impacts of brucellosis in wildlife to livestock producers in the DSA.
STRATEGIC OBJECTIVE: Improve research/monitoring and understanding of Brucella abortus biology and behavior to increase efficacy of management.

STRATEGIC OBJECTIVE: Maximize coordination among all stakeholders, agencies and jurisdictions dealing with brucellosis reduction in and around the Greater Yellowstone area.

FUNDAMENTAL OBJECTIVE: Minimize transmission.

MEANS OBJECTIVE: Develop more effective Brucella abortus vaccine and vaccination protocols.

MEANS OBJECTIVE: Contain, reduce, and eventually eliminate Brucellosis.

MEANS OBJECTIVE: Minimize seroprevalence in elk in each wintering elk herd within the DSA (measure seroprevalence).

MEANS OBJECTIVE: Reduce harboring (instances of relatively little or reduced human disturbance that may result in concentrations of elk).

FUNDAMENTAL OBJECTIVE: Maximize acceptability of elk management tools and populations in the DSA for:
Sportspersons (measure with satisfaction survey),
Wildlife enthusiasts (measure with satisfaction survey),
Landowners (measure with satisfaction survey), and
Livestock producers (measure with satisfaction survey).

MEANS OBJECTIVE: Economic (minimize regulations/regulation changes on restriction of current export of MT cattle (consultation between Department of Livestock & FWP).

MEANS OBJECTIVE: Logistical (minimize # livestock tested annually as a percent of total population in DSA).

MEANS OBJECTIVE: Cultural (stigma) (minimize difference between market price ($/head) between comparable cattle originating inside DSA and outside DSA).

FUNDAMENTAL OBJECTIVE: Maximize cost effectiveness.

Action Alternative – Additional Management of Elk Distribution

(List does not contain all potential actions. Other actions may be identified consistent with the intent to adjust elk distribution. Many action items identified by local working groups would require additional FWP Commission approval prior to implementation.)

Hunting

- Reduce winter herd size/density
- Develop adaptive hunting regulations
- Develop late season hunts beyond 15 Feb
- FWP use hunt coordinators for management hunts
- Use season structure to address harboring

Habitat

- Perform/suggest landscape alterations that will promote spatial and temporal separation of elk and livestock during critical brucellosis risk periods
- Small, scattered manipulation (for example, high intensity/short duration livestock grazing of underused areas) of native vegetation on WMAs and public lands to attract/retain elk
- Plantings
- More rest/rotation grazing

- Water development

Containment

- In open (primarily non-timbered) elk winter range, reduce wolf/pack numbers
- More intensive hazing of elk in high risk areas
- Public funding for fencing cattle feeding areas
- Decrease harboring
- Elk-proof fencing for high-risk areas by locale
- Purchase/lease more WMAs for purpose of spatial separation
- Endorse development of collaborative incentives for harborers to allow access

Research/education

- Increase monitoring of seropositive elk movements
- Expand ongoing elk distribution research to DSA and contiguous areas
- Educate harborers (neighbor, affected party, FWP/DOL contacts)
- Delist B. abortus so vaccine can be researched
- Expand ongoing seroprevalence research to DSA and contiguous areas

The working group recommends the concept of local working groups to assist FWP in identifying, implementing and evaluating specific management actions. These working groups were not specifically defined and may be new or existing groups, formal or informal, long lasting or temporary. At a minimum, they should reasonably represent the various values and perspectives that include elk and livestock interests.

Appendix 2

BRUCELLOSIS WORKING GROUP ACTION ITEM EXAMPLES, MECHANISMS, AUTHORITIES & TIME FRAMES FOR IMPLEMENTATION

[**working group items in bold,** possible examples in underline, *(process in italics/parenthesis)]*

NOTE: List does not contain all potential actions. Other actions may be identified consistent with the intent to adjust elk distribution. The concept of local working groups is recommended to assist FWP in identifying, implementing and evaluating management efforts. *(Note additional process in italics and parenthesis for some specific working group action items required prior to implementation.)*

Hunting

Reduce winter herd size/density

Identify reduced population objective *(annual Commission approval)*
Increase available wintering habitat *(landowner tolerance)*

Develop adaptive hunting regulations *(biennial Commission approval)*

Develop late season hunts beyond 15 Feb *(annual/biennial Commission approval, potential ARM development)*

FWP use hunt coordinators for management hunts *(annual resource allocation)*

Use season structure to address harboring *(biennial Commission approval)*

Habitat

Perform/suggest landscape alterations that will promote spatial and temporal separation of elk and livestock during critical brucellosis risk periods

(EA/EIS, collaboration with private landowners and/or land management agencies)

Small, scattered manipulation (for example, high intensity/short duration livestock grazing of underused areas) of native vegetation on WMAs and public lands to attract/retain elk

(EA, collaboration with land management agencies, annual work plans and resource allocation)

Plantings

Planting forage species to entice/hold elk (alfalfa, etc.)

(EA, collaboration with land management agencies, collaboration with private landowners, annual work plans and resource allocation)

More rest/rotation grazing

(EA, collaboration with private landowners and/or land management agencies)

Water development
(EA, collaboration with private landowners and/or land management Agencies; annual work plans and resource allocation)

Containment

In open (primarily non-timbered) elk winter range, reduce wolf/pack numbers
Wolf season adjustments *(annual Commission approval)*

More intensive hazing of elk in high risk areas
(annual resource allocation, collaboration with private landowners)

Public funding for fencing cattle feeding areas
(annual resource allocation, collaboration with private landowners, potential ARM development)

Decrease harboring
(collaboration with private landowners)
Adjust hunting season structure *(biennial Commission approval)*

Elk-proof fencing for high-risk areas by locale
(annual resource allocation, collaboration with private landowners, potential ARM development)

Purchase/lease more WMAs for purpose of spatial separation
(EA, public review, collaboration with private landowners and/or land management agencies Commission and Land Board approval, annual work plans and resource allocation)

Endorse development of collaborative incentives for harborers to allow access
(public review, potential Commission/Legislative approval)

Research/education

Increase monitoring of seropositive elk movements
(annual resource allocation, collaboration with private landowners and other agencies)

Expand ongoing elk distribution research to DSA and contiguous areas
(annual resource allocation, collaboration with private landowners and other agencies)

Educate harborers (neighbor, affected party, FWP/DOL contacts)
(annual resource allocation, collaboration with private landowners and other agencies)

Delist B. abortus so vaccine can be researched
(collaboration with other agencies)

Expand ongoing seroprevalence research to DSA and contiguous areas
(annual resource allocation, collaboration with private landowners and other agencies)

Appendix 3

ELK MANAGEMENT GUIDELINES IN AREAS WITH BRUCELLOSIS WORKING GROUP BRIEFING PAPER

BACKGROUND: Livestock brucellosis infections attributed to elk is a concern within the Designated Surveillance Area (DSA) established by the Montana Board of Livestock in January 2010 when its predecessor, the Brucellosis Action Plan, expired. From the Department of Livestock website, "Both the Action Plan and DSA were created and implemented to help the state regain and maintain its brucellosis-free status after the disease was found twice in a 12-month period (May 2007, May 2008)." Montana's DSA is entirely within FWP Region 3 and has had two boundary expansions since 2010. Elk testing positive for exposure to brucellosis (seroprevalence) appear to be increasing in some elk populations and there is considerable debate over elk management in the DSA. In response to these circumstances FWP and the FWP Commission initiated the Elk Management Guidelines in Areas with Brucellosis Working Group in the fall of 2011. From the initial call for interest, it was noted any consensus products by this group would be directed to the FWP Director and FWP Commission for consideration and potential endorsement. A Commission-endorsed product will represent focus and direction for elk management in areas with brucellosis.

WORKING GROUP CHARTER: *Collaboratively identify a problem statement, fundamental objectives and potential management options relative to effective management of elk in areas where brucellosis has been identified and where there is concern about brucellosis transmission between livestock and elk.*

WORKING GROUP MEMBER SELECTION AND COMPOSITION: A call for nominations was made with over 40 applicants submitting their names for consideration. In pursuit of a diverse working group the following twelve individuals (listed in alphabetical order) were selected by FWP Director Joe Maurier.

Mr. Mark R. Albrecht is a hunter and veterinarian from Bozeman.
Mr. John C. Anderson is a livestock producer and Block Management Cooperator from Alder.
Mr. Ed Bukoskey is a hunter and an agricultural landowner from Rosebud.
Mr. Joe Cohenour is a hunter from East Helena.
Mr. Rick Douglass is a hunter involved with disease research as a MT Tech professor in Butte.
Mr. Rick Gibson is a hunter and livestock producer from Livingston.
Mr. Lorents Grosfield is a livestock producer and former legislator from Big Timber.
Mr. Ken Hamlin is a hunter and retired elk research biologist from Bozeman.
Mr. Raymond Marxer is a hunter and livestock producer from Twin Bridges.
Mr. Charlie Noland is a hunter and veterinarian from Huntley.
Mr. William Raths is a hunter and veterinarian from Lewistown.
Mr. C. Thomas Rice is a hunter, livestock producer and County Commissioner from Dillon.

MEETINGS: A total of six meetings took place on January 26-27, February 21-22, March 20-21, April 26-27, May 30-31 and June 26-27. All meetings ran for approximately twelve hours across 1-1/2 days for a total of 72 possible meeting hours for each participant (not counting travel or "homework" between meetings). Attendance for working group members was at or near 100% throughout this effort. All meetings were held at the FWP Region 3 office in Bozeman, were

noticed with press releases or on the FWP website and were open to the public with opportunities for public comment. Public attendance and comment was limited. The first meeting included informational research and management presentations from wildlife agency staff from Idaho, Wyoming and Yellowstone National Park. FWP and Department of Livestock staff also presented information at that first meeting. Presentations were made available on the FWP website.

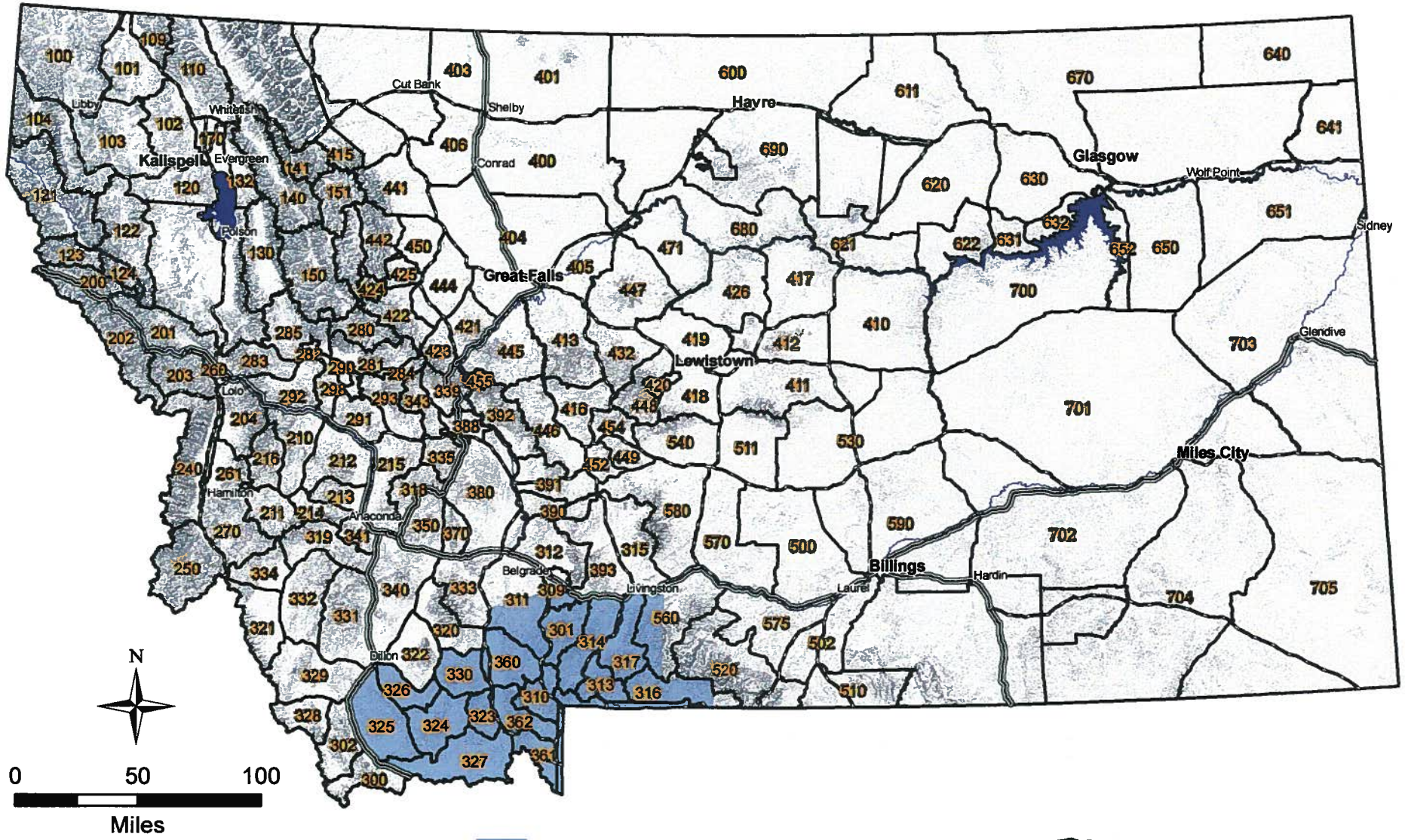
STAFF: Agency staff routinely assisting the working group included Dr. Mike Mitchell from the University of Montana Wildlife Research Cooperative Unit, FWP Research and Technical Services Section Supervisor Justin Gude, Montana Department of Livestock Brucellosis Veterinarian Eric Liska and FWP Sections Coordinator Quentin Kujala. Other agency staff that routinely attended and/or presented information included FWP Wildlife Veterinarian Jennifer Ramsey and FWP Lab Supervisor Neil Anderson along with FWP Region 3 staff and personnel from the U.S. Department of Agriculture Animal and Plant Health Inspection Service (USDA/APHIS) and the U.S. Fish and Wildlife Service (USFWS).

PROCESS: Structured decision making (SDM) was used to facilitate this effort. SDM is the formalized application of common sense to decision-making and is designed to improve the quality, efficacy and transparency of difficult decisions. There are five steps arranged in iterative sequence: defining the PROBLEM (or ISSUE STATEMENT), identifying OBJECTIVES that would characterize successful resolution of the problem, developing management ALTERNATIVES to meeting those objectives, identifying CONSEQUENCES for each of the alternatives, and evaluating TRADE-OFFS among the alternatives.

NEXT STEPS: Recognizing the complexity of the topic, the working group recommendations were initially presented to the FWP Commission on August 30 in an "Informational" context. Another informational presentation was made at the October Commission meeting. These recommendations were then presented and initially adopted on November 8 to initiate this formal public review and comment period. Any final endorsement by the Commission would occur in early 2013 after public comment has been received.

MANAGEMENT UTILITY: A Commission-endorsed product will represent focus and direction for elk management in areas with brucellosis.

2012 Brucellosis Designated Surveillance Area and Deer/Elk Hunting Districts



Brucellosis Designated Surveillance Area (DSA)

Deer/Elk Hunting Districts

DSA digitized from description provided by the Montana Department of Livestock:
http://liv.mt.gov/brucellosis/default.mcpx

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